

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**RICHMOND, VIRGINIA 23261**

**March 18, 2002**

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No.:	02-161
CM/RAB	R0
Docket Nos.:	50-338
	50-339
License Nos.:	NPF-4
	NPF-7

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**PROPOSED IMPROVED TECHNICAL SPECIFICATIONS (ITS)**  
**REQUESTED CHANGE TO SUBMITTAL**

This letter transmits a revision to the North Anna Power Station (NAPS) Units 1 and 2 proposed Improved Technical Specifications (ITS). The North Anna ITS license amendment request was submitted to the NRC in a December 11, 2000 letter (Serial No. 00-606). In a telephone conversation on March 8, 2002, the NRC requested that we remove a change that had been proposed to ITS Table 3.3.2-1, Function 8.c,  $T_{avg}$  - Low Low, P-12. This change had removed the lower limit on the Allowable Value for P-12. Based on the NRC's request, we are revising the ITS to reinstate the lower limit of 542°F.

The attachment to this letter includes a summary of the change to the ITS submittal, and the revised pages of the submittal. Additionally, the revised pages of the Discussion of Changes (DOC) tables are attached.

If you have any further questions or require additional information, please contact us.

Very truly yours,



Leslie N. Hartz  
Vice President - Nuclear Engineering

Attachment

Commitments made in this letter: None

A001

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SN: 02-161

Docket Nos.: 50-338/339

Subject: Proposed ITS – Requested Change to Submittal

COMMONWEALTH OF VIRGINIA     )  
   )  
COUNTY OF HENRICO             )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz, who is Vice President - Nuclear Engineering, of Virginia Electric and Power Company. She has affirmed before me that she is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of her knowledge and belief.

Acknowledged before me this 18th day of March, 2002.

My Commission Expires: March 31, 2004.

  
Notary Public

(SEAL)

**Attachment**

**Proposed Improved Technical Specifications  
Revision to ITS Table 3.3.2-1, Function 8.c**

**Virginia Electric and Power Company  
(Dominion)**

**North Anna Power Station Units 1 and 2**

**NAPS Responses to NRC Requests for Additional Information  
ITS LCO 3.3.2, ESFAS Instrumentation**

Based on NRC verbal comments, an additional limit for the permissive P-12 is added to the ITS.

The CTS lists two allowable values for P-12. The first limit,  $\leq 545$  °F, prevents manual block of safety injection (SI) actuation on high steam line flow. The second limit,  $\geq 541$  °F, allows manual block of SI actuation on high steam line flow. In the original ITS submittal, both values were included in the ITS. The lower limit of 541 °F was changed to 542 °F to reflect the new setpoint methodology. In Supplement 6, the Company revised the North Anna ITS to only include the single value of  $\leq 545$  °F. On March 8, 2002, the NRC verbally informed the Company that there was insufficient time to evaluate the change to the permissive P-12 limits before the desired date for issuance of the NRC Safety Evaluation for the ITS conversion. Therefore, the Company is withdrawing the change made in Supplement 6 and restoring the two limits provided in the original ITS submittal.

This change affects ITS 3.3.2, Table 3.3.1-2, Function 8.c; the ISTS markup for Function 8.c; ITS JFDs 14 and 16; CTS markup pages 10 of 21 for Unit 1 and Unit 2; and DOCs M.7 and L.5. DOC M.7 describes the change from the CTS limit of 541 °F to the ITS value of 542 °F. DOC L.5 described changes to P-11 and P-12. It is revised to only discuss changes to P-11. The ITS Bases, the ISTS Bases markup, and Bases JFDs are unaffected.

Table 3.3.2-1 (page 4 of 4)  
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	
6. Auxiliary Feedwater						
a. Automatic Actuation Logic and Actuation Relays	1, 2, 3	2 trains	G	SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5	NA	
b. SG Water Level—Low Low	1, 2, 3	3 per SG	D	SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.8 SR 3.3.2.9	≥ 17%	
c. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
d. Loss of Offsite Power	1, 2, 3	1 per bus, 2 buses	F	SR 3.3.2.6 SR 3.3.2.8 SR 3.3.2.9	≥ 2184 V	RAI 3.3.2-02 R6
e. Trip of all Main Feedwater Pumps	1, 2	2 per pump	H	SR 3.3.2.7 SR 3.3.2.9	NA	R6
7. Automatic Switchover to Containment Sump						
a. Automatic Actuation Logic and Actuation Relays	1, 2, 3, 4	2 trains	C	SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5	NA	
b. Refueling Water Storage Tank (RWST) Level—Low Low	1, 2, 3, 4	4	I	SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.8 SR 3.3.2.9	≥ 18.4% and ≤ 20.4%	
Coincident with Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
8. ESFAS Interlocks						
a. Reactor Trip, P-4	1, 2, 3	1 per train, 2 trains	F	SR 3.3.2.10	NA	
b. Pressurizer Pressure, P-11	1, 2, 3	3	J	SR 3.3.2.1 SR 3.3.2.8	≤ 2010 psig	R6
c. T <sub>avg</sub> —Low Low, P-12	1, 2, 3	1 per loop	J	SR 3.3.2.1 SR 3.3.2.8	≥ 542°F and ≤ 545°F	R18

ESFAS Instrumentation  
3.3.2

Table 3.3.2-1 (page 8 of 8)  
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	TRIP SETPOINT (a) ⑥
7. Automatic Switchover to Containment Sump (continued)						
c. RWST Level - Low Low	1,2,3,4	4	K	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≥ [15]%	≥ [18]%
Coincident with Safety Injection and	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
Coincident with Containment Sump Level - High	1,2,3,4	4	K	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≥ [30] in. above el. [703] ft	≥ [ ] in. above el. [ ] ft
8. ESFAS Interlocks						
a. Reactor Trip, P-4	1,2,3	1 per train, 2 trains	F	SR 3.3.2.10	NA	NA
b. Pressurizer Pressure, P-11	1,2,3	3	④ ⑤ ⑥ ⑦ ⑧ ⑨ ⑩ ⑪ ⑫	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9	≤ (20.0) (1) (11) (12) psig	≤ [ ] psig
c. T <sub>avg</sub> - Low Low, P-12	1,2,3	11 per loop	① ② ③ ④ ⑤ ⑥ ⑦ ⑧ ⑨ ⑩ ⑪ ⑫	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9	≥ (558.6)°F and ≤ 545°F	≥ [553]°F

(a) Reviewer's Note: Unit specific implementations may contain only Allowable Value depending on Setpoint Study methodology used by the unit. ②

**JUSTIFICATION FOR DEVIATIONS**  
**ITS 3.3.2, ESFAS**

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requirements of the COT and is performed every 18 months, it is not necessary to require the COT. Therefore, ISTS SR 3.3.2.5 is deleted.

13. ISTS Function 3.b for Containment Isolation Manual Initiation (1) and Containment Pressure High High (3) for Phase B isolation specify requirements that are not applicable to North Anna. The Containment Isolation Phase B manual function is accomplished by the manual switches for Containment Spray manual initiation. The Containment Pressure High High is initiated from the Containment Spray Containment Pressure High High signal. Therefore, the requirements for the Phase B manual initiation are replaced with "Refer to Function 2.b (Containment Spray – Manual Initiation) for all functions and requirements" and the Phase B Containment Pressure High High is replaced with, "Refer to Function 2.c (Containment Spray – Containment Pressure High High) for all functions and requirements." This is acceptable because the Containment Isolation Phase B functions are initiated by the Containment Spray signals.
14. Not used.
15. ISTS LCO 3.3.2 in Table 3.3.2 –1 Function 6.e (AFW pumps start on a trip of all Main Feedwater pumps) requires the performance of SRs 3.3.2.8, 3.3.2.9, and 3.3.2.10. ITS LCO 3.3.2 in Table 3.3.2 – 1 for Function 6.e requires the performance of SRs 3.3.2.7 and 3.3.2.9. This changes the ISTS by deleting the requirement for performing a CHANNEL CALIBRATION for the function. The Main Feedwater pumps are electric motor driven pumps controlled by electric circuit breakers. This type of controller for the Main Feedwater pumps requires only a TADOT to be performed to verify proper operation and does not require a CHANNEL CALIBRATION.
16. ITS LCO 3.3.2 in Table 3.3.2-1 Function 8.c (P-12) lists the Allowable Values as  $\geq 542^{\circ}$  F and  $\leq 545^{\circ}$  F. This change is acceptable because these values represent the requirements of the CTS and the setpoint methodology for calculating the Allowable Values.

R6,  
R18

R6

R18



ITS

DESIGNATION

8b P-11

8c P-12

3/4 3-23

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A.1

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURE INTERLOCKS

<u>CONDITION</u>	<u>SETPOINT</u>	<u>ALLOWABLE VALUES</u>	<u>FUNCTION</u>
With 2 of 3 pressurizer pressure channels above setpoint	2000 psig	$\leq 2010$ psig	P-11 prevents manual block of safety injection actuation on low-low pressurizer pressure.
With 2 of 3 pressurizer pressure channels below setpoint	1980 psig	$\leq 1990$ psig (L.5)	P-11 allows manual block of safety injection actuation on low-low pressurizer pressure.
With 2 of 3 T <sub>avg</sub> channels above setpoint	543°F (Nominal)	$\leq 545$ °F	P-12 prevents manual block of safety injection actuation on high steam line flow.
With 2 of 3 T <sub>avg</sub> channels below setpoint	543°F (Nominal)	$\geq 541$ °F (542) (M.7)	P-12 allows manual block of safety injection actuation on high steam line flow.

LA.4

LA.8

R6

R6, R18

LA.4

Rev 18

A.1.1

TABLE 3.3-3 (Continued)  
ENGINEERED SAFETY FEATURE INTERLOCKS

DESIGNATION	CONDITION	SETPOINT	ALLOWABLE VALUES	FUNCTION
8b P-11	With 2 of 3 pressurizer pressure channels above setpoint With 2 of 3 pressurizer pressure channels below setpoint	2000 psig 1980 psig	$\leq 2010$ psig $\leq 1990$ psig L.5	P-11 prevents manual block of safety injection actuation on low-low pressurizer pressure. P-11 allows manual block of safety injection actuation on low-low pressurizer pressure.
8c P-12	With 2 of 3 T <sub>avg</sub> channels above setpoint With 2 of 3 T <sub>avg</sub> channels below setpoint	543°F (Nominal) 543°F (Nominal)	$\leq 545^\circ\text{F}$ $\geq 541^\circ\text{F}$ 542 M.7 R6, R18	P-12 prevents manual block of safety injection actuation on high steam line flow. P-12 allows manual block of safety injection actuation on high steam line flow.

## DISCUSSION OF CHANGES

### ITS 3.3.2, ESFAS

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“Verification of relay setpoints not required.” This changes the CTS by requiring the TADOT to be performed every 92 days.

This change is acceptable because the verification that the signal from the Loss of Offsite Power will start the AFW pumps should be periodically tested to ensure OPERABILITY. A testing frequency of 92 days is adequate based on industry operating experience, considering the instrument reliability and operating history. This change is designated as more restrictive because the testing requirements have been increased from the CTS requirements.

- M.7 CTS requirements in Table 3.3-3 list the Allowable Values for ESFAS Functions and Interlocks. The Allowable Values for the following function are stated as: P-12  $\geq 541$  °F, Safety Injection (SI) on Containment Pressure High  $\leq 18.5$  psia, SI on Pressurizer Pressure Low-Low  $\geq 1755$  psig, SI on Steam Flow in Two Steam Lines Coincident with  $T_{ave}$  Low-Low or Steam Line Pressure Low  $\leq$  a  $\Delta P$  corresponding to 44% of full steam flow increasing to 111.5% at full load, Containment Spray on Containment Pressure High-High  $\leq 29.25$  psia, Steam Line Isolation on Containment Pressure Intermediate High-High  $\leq 19.3$  psia, and Steam Line Isolation on Steam Flow in Two Steam Lines Coincident with  $T_{ave}$  Low-Low or Steam Line Pressure Low  $\leq$  a  $\Delta P$  corresponding to 44% of full steam flow increasing to 111.5% at full load. ITS requirements in Table 3.3.2-1 lists the Allowable Values for the ESFAS Functions and Interlock as the following: P-12  $\geq 542$  °F, SI on Containment Pressure High  $\leq 17.7$  psia, SI on Pressurizer Pressure Low-Low  $\geq 1770$  psig, SI on Steam Flow in Two Steam Lines Coincident with  $T_{ave}$  Low-Low or Steam Line Pressure Low  $\leq$  a  $\Delta P$  corresponding to 42% of full steam flow increasing to 111% at full load, Containment Spray on Containment Pressure High-High  $\leq 28.45$  psia, Steam Line Isolation on Containment Pressure Intermediate High-High  $\leq 18.5$  psia, and Steam Line Isolation on Steam Flow in Two Steam Lines Coincident with  $T_{ave}$  Low-Low or Steam Line Pressure Low  $\leq$  a  $\Delta P$  corresponding to 42% of full steam flow increasing to 111% at full load. This changes the CTS Allowable Values for these functions to more restrictive values in the ITS Allowable Values.

R6,  
R1B

R6,  
R1B

R6

The purpose of these changes for the listed functions are to align the ITS Allowable Values by using a consistent setpoint methodology. These changes are acceptable because the ITS Allowable Values are consistent with the methodology used for all ESFAS Functions. These changes are designated as more restrictive because the ITS Allowable Values are more restrictive than the CTS Allowable Values.

- M.8 CTS Table 4.3 – 2 for Functional Unit 8.c, Engineered Safety Feature Actuation System Interlock Reactor Trip (P – 4), requires the performance of a CHANNEL FUNCTIONAL TEST every refueling (R). ITS Function 8.a, ESFAS Interlock, Reactor Trip (P – 4), requires the performance of SR 3.3.2.10. This SR requires the performance of a TADOT at a frequency of once per reactor trip breaker (RTB) cycle. The SR is modified by a Note that states, “Verification of setpoint not required.” The ITS TADOT and CTS CHANNEL FUNCTIONAL TEST requirements are

RA1  
3.3.2-6  
R6,  
R1B

## DISCUSSION OF CHANGES

### ITS 3.3.2, ESFAS

RTT to be within specific limits. A Note is added to the requirement that provides an exception for the turbine driven AFW pump. The allowance delays the required verification by 24 hours after Main Steam pressure reaches 1005 psig. This changes the CTS by allowing the RTT verification to be delayed for 24 hours after the unit reaches a stable condition for testing.

RAI  
3.3.2-15  
R6

The purpose of the CTS Surveillance Requirement is to ensure that the AFW system can provide water to the steam generator within the time frames assumed in the safety analyses. This change is acceptable because it has been determined that the relaxed Surveillance Requirement acceptance criteria continues to verify that the equipment used to meet the LCO can perform its required functions. This change provides an allowance for entry into MODE 3 before testing of the steam driven AFW pump to ensure that there is sufficient steam pressure to accurately test the pump. This change will provide consistent test conditions for verification of response time for the steam driven AFW pump. This is part of the required testing to ensure continued OPERABILITY. This change is designated as less restrictive because less stringent Surveillance Requirements are being applied in the ITS than were applied in the CTS.

RAI  
3.3.2-15  
R6

- L.4 *(Category 7 – Relaxation Of Surveillance Frequency)* CTS Table 4.3-2 notation (1) is associated with the manual initiation switches for Safety Injection, Containment Spray, Containment Isolation (Phase A and B), Steam Line Isolation, and the start of the AFW pumps. The notation requires that each manual actuation switch be tested to actuate the required function at least once per 18 months during shutdown. In ITS Table 3.3.2-1, for each of the listed functions, SR 3.3.2.7 states that a TADOT must be performed at a frequency of eighteen months. This changes the CTS by deleting the “during shutdown” requirement and requires the test be performed every 18 months.

RAI  
3.3.2-7  
R6

This change is acceptable because the new Surveillance Frequency has been evaluated to ensure that it provides an acceptable level of equipment reliability. The Frequency for testing of the manual switches for the various functions has been changed from 18 months “during shutdown” to 18 months. The performance of the testing will continue to be performed in a condition that would not create a transient on the unit. Therefore, the testing will generally will be conducted in MODES 5 and 6 (i.e., during unit shutdown). This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

- L.5 *(Category 1 – Relaxation of LCO Requirements)* CTS 3.3.2.1 requirements listed in Table 3.3-3 for P-11 specifies two limits for the Allowable Value. The P-11 function allowable value of:  $\leq 2010$  psig prevents manual block of Safety Injection (SI) on Low Low Pressurizer Pressure; and  $\leq 1990$  psig allows the manual block of SI on Low Low Pressurizer Pressure. ITS 3.3.1 requirements in Table 3.3.1-1 for Reactor Trip System interlock P-11 lists only the allowable value that prevents manual block of the function. This value is  $\leq 2010$  psig. This changes the CTS by eliminating the P-11 interlock value for allowing manual function block.

R6,  
R18

## DISCUSSION OF CHANGES

### ITS 3.3.2, ESFAS

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This change is acceptable because the LCO requirements continue to ensure that the process variables are maintained consistent with the safety analyses and licensing basis. The safety function for P – 11 is to prevent the manual blocking of SI on Low Low Pressurizer Pressure. This function provides the interlock assumed in the safety analyses. Allowing the manual block is not an assumed safety function and, therefore, the Allowable Value for allowing manual block is not required and is deleted. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.

R6,  
R18

- L.6 (Category 2 – Relaxation of Applicability) CTS Table 3.3-3 for Functional Units 5.a and 5.b, Turbine Trip and Feedwater Isolation on Steam Generator (SG) Water Level – High-High and Automatic Actuation Logic and Actuation Relays, requires for each an applicability of MODES 1, 2, and 3<sup>###</sup>. Notation <sup>###</sup> states, “Except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.” ITS Table 3.3.2 – 1 for Function 5, Turbine Trip and Feedwater Isolation, requires that Functions 5.a and 5.b, Automatic Actuation Logic and Actuation Relays and SG Water Level – High High, be OPERABLE in MODES 1, 2<sup>(e)</sup>, and 3<sup>(e)</sup>. Note <sup>(e)</sup> states, “Except when all Main Feedwater pump discharge valves or all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.” This changes the CTS by modifying the MODES 2 and 3 applicability with the addition of the Main Feedwater (MFW) pump discharge valves to the list.

R6

The purpose of ITS Note e is to ensure MFW is isolated from the SGs. This change is acceptable because the requirements continue to ensure that the ability to isolate MFW from the SGs is maintained in the MODES and other specified conditions assumed in the safety analyses and licensing basis. The addition of the MFW pump discharge valves is acceptable because the valves can provide completion isolation of the MFW system from the SGs. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the CTS.

Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M.6	CTS Surveillance Requirements listed in Table 4.3-2 for the Station Blackout start for the Auxiliary Feedwater (AFW) pump (function 6.e) requires a CHANNEL CALIBRATION and ESFAS RESPONSE TIMES test to be conducted on a refueling basis. The CTS does not require a CHANNEL FUNCTIONAL TEST to be performed at any frequency. The ITS 3.3.2 Function for the start of the AFW pump on Loss of Offsite Power (6.d) requires the performance of SRs 3.3.2.8 (CHANNEL CALIBRATION) and 3.3.2.9 (ESFAS RESPONSE TIMES) every 18 months, and 3.3.2.6 (TADOT) every 92 days. The TADOT is modified by a Note that states, "Verification of relay setpoints not required." This changes the CTS by requiring the TADOT to be performed every 92 days.	SR 3.3.2.6	None
3.3.2 M.7	CTS requirements in Table 3.3-3 list the Allowable Values for ESFAS Functions and Interlocks. The Allowable Values for the following function are stated as: P-12 $\geq 541$ °F, Safety Injection (SI) on Containment Pressure High $\leq 18.5$ psia, SI on Pressurizer Pressure Low-Low $\geq 1755$ psig, SI on Steam Flow in Two Steam Lines Coincident with $T_{ave}$ Low-Low or Steam Line Pressure Low $\leq \Delta P$ corresponding to 44% of full steam flow increasing to 111.5% at full load, Containment Spray on Containment Pressure High-High $\leq 29.25$ psia, Steam Line Isolation on Containment Pressure Intermediate High-High $\leq 19.3$ psia, and Steam Line Isolation on Steam Flow in Two Steam Lines Coincident with $T_{ave}$ Low-Low or Steam Line Pressure Low $\leq \Delta P$ corresponding to 44% of full steam flow increasing to 111.5% at full load. ITS requirements in Table 3.3.2-1 lists the Allowable Values for the ESFAS Functions and Interlock as the following: P-12 $\geq 542$ °F, SI on Containment Pressure High $\leq 17.7$ psia, SI on Pressurizer Pressure Low-Low $\geq 1770$ psig, SI on Steam Flow in Two Steam Lines Coincident with $T_{ave}$ Low-Low or Steam Line Pressure Low $\leq \Delta P$ corresponding to 42% of full steam flow increasing to 111% at full load, Containment Spray on Containment Pressure High-High $\leq 28.45$ psia, Steam Line Isolation on Containment Pressure Intermediate High-High $\leq 18.5$ psia, and Steam Line Isolation on Steam Flow in Two Steam Lines Coincident with $T_{ave}$ Low-Low or Steam Line Pressure Low $\leq \Delta P$ corresponding to 42% of full steam flow increasing to 111% at full load. This changes the CTS Allowable Values for these functions to more restrictive values in the ITS Allowable Values.	Table 3.3.2-1	Table 3.3-3
3.3.2 M.8	CTS Table 4.3 – 2 for Functional Unit 8.c, Engineered Safety Feature Actuation System Interlock Reactor Trip (P – 4), requires the performance of a CHANNEL FUNCTIONAL TEST every refueling (R). ITS Function 8.a, ESFAS Interlock, Reactor Trip (P – 4), requires the performance of SR 3.3.2.10. This SR requires the performance of a TADOT at a frequency of once per reactor trip breaker (RTB) cycle. The SR is modified by a Note that states, "Verification of setpoint not required." The ITS TADOT and CTS CHANNEL FUNCTIONAL TEST requirements are equivalent. This changes the CTS by increasing the testing Frequency from once per refueling cycle to each time the reactor trip breaker is cycled.	SR 3.3.2.10	Table 4.3 – 2

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.2 L.4	CTS Table 4.3-2 notation (1) is associated with the manual initiation switches for Safety Injection, Containment Spray, Containment Isolation (Phase A and B), Steam Line Isolation, and the start of the AFW pumps. The notation requires that each manual actuation switch be tested to actuate the required function at least once per 18 months during shutdown. In ITS Table 3.3.2-1, for each of the listed functions, SR 3.3.2.7 states that a TADOT must be performed at a frequency of eighteen months. This changes the CTS by deleting the “during shutdown” requirement and requires the test be performed every 18 months.	SR 3.3.2.7	Table 4.3-2 NOTE (1)	7
3.3.2 L.5	CTS 3.3.2.1 requirements listed in Table 3.3-3 for P-11 specifies two limits for the Allowable Value. The P-11 function allowable value of: $\leq 2010$ psig prevents manual block of Safety Injection (SI) on Low Low Pressurizer Pressure; and $\leq 1990$ psig allows the manual block of SI on Low Low Pressurizer Pressure. ITS 3.3.1 requirements in Table 3.3.1-1 for Reactor Trip System interlock P-11 lists only the allowable value that prevents manual block of the function. This value is $\leq 2010$ psig. This changes the CTS by eliminating the P-11 interlock value for allowing manual function block.	Table 3.3.2-1	Table 3.3.-3	1

Change Category:

- 1 - Relaxation of LCO Requirements
- 2 - Relaxation of Applicability
- 3 - Relaxation of Completion Time
- 4 - Relaxation of Required Action
- 5 - Deletion of Surveillance Requirement
- 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
- 7 - Relaxation Of Surveillance Frequency
- 8 - Deletion of Reporting Requirements